

3. Immediately following the conclusion of the Delarosa trial, one of Plaintiff's counsel was involved in a trial which began on October 18, 2011 and concluded on October 24, 2011 in the matter of Demetrius Patton v. Chicago Police Officer Michael Bernichio, et al., 09 C 2901.

4. Both of Plaintiff's counsel have also been diligently working on a response to a Motion for Summary Judgment in the matter of Bobby Ezell v. IDOC Officer Shaun Bass, et al., 09 C 6908, which was filed on November 4, 2011.

5. In addition, both of Plaintiff's counsel have also been diligently working on a response to a Motion for Summary Judgment as well as a Pre-Trial Order in the matter of Finis Dorsey v. Chicago Police Officer John Smith, et al., 10 C 3041, which was also filed on November 4, 2011. The Dorsey matter is scheduled to start trial on December 5, 2011, before the Honorable Judge Virginia Kendall.

6. Also, one of Plaintiff's counsel is preparing to begin a trial in the matter of Gabriel Govea, et al. v. City of Chicago, et al., 09 C 4143, which is scheduled to begin on November 7, 2011 before the Honorable Judge William T. Hart.

7. Plaintiff's counsel have consulted with and expect to retain, Dr. Robert B. Greifinger as an expert in this case. Dr. Greifinger has received and reviewed certain materials but needs additional materials in order to prepare a report. Dr. Greifinger has also advised the undersigned that he will have limited availability between now and Thanksgiving. Accordingly, Plaintiff requests leave of Court to disclose their expert after Thanksgiving.

8. This request is not made to delay the proceedings, rather it is made in the interest of justice and so as to afford the Plaintiff effective representation.

WHEREFORE, for the reasons stated above, Plaintiff respectfully requests this Honorable Court to enter an order extending the Plaintiff's time to disclose his experts until December 1, 2011.

Respectfully submitted,

/s/ Michael D. Robbins
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